

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** :  
:  
v. : **NO. 3:23-CR-301**  
:  
**PAUL HELRING,** : **(JUDGE MARIANI)**  
:  
**Defendant** :  
: **ELECTRONICALLY FILED**

**MOTION TO MAKE PAYMENT OF RESTITUTION**

Defendant Paul Helring, by and through his undersigned counsel, hereby requests entry of an Order authorizing the Clerk of Court to receive his payment of restitution on or before Friday, May 31, 2024, and in support thereof, avers as follows:

1. On November 19, 2023, Mr. Helring executed a Plea Agreement pursuant to which he is bound, *inter alia*, to pay full restitution in the amount of \$17,831.40. *See* Plea Agreement at ¶16 (ECF 3). At a hearing before Your Honor on January 25, 2024, the Court accepted Mr. Helring's guilty plea. (ECF 17).
2. Sentencing in this matter is scheduled before Your Honor on Tuesday, June 4, 2024.
3. In order to fully and promptly meet the obligations of the Plea Agreement, Mr. Helring seeks to place the restitution amount into the custody of the Clerk of Court on or before Friday, May 31, 2024.

4. Undersigned counsel has sought the concurrence of counsel for the Government in the foregoing Motion, and the Government concurs in the Motion.

WHEREFORE, Mr. Helring respectfully asks the Court to enter an Order in the form attached authorizing the Clerk of Court to receive the restitution payment in the amount of \$17,831.40 on or before Friday, May 31, 2024.

Respectfully submitted,

/s/ John B. Dempsey

John B. Dempsey

Patrick A. Casey

Myers, Brier & Kelly, LLP

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Scranton, PA 18503

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Date: May 29, 2024

*Attorneys for Defendant, Paul Helring*

**CERTIFICATE OF CONCURRENCE**

I, John B. Dempsey, hereby certify that I sought the concurrence of Assistant United States Attorney Jeffery St. John, Esquire, in this Motion. Mr. St. John concurs in this Motion.

/s/ John B. Dempsey  
John B. Dempsey

Date: May 29, 2024

**CERTIFICATE OF SERVICE**

I, John B. Dempsey, hereby certify that I have served a true and correct copy of the foregoing Motion to Make Payment of Restitution upon the following parties via the Court's ECF system on this 29<sup>th</sup> day of May 2024:

Jeffery F. St. John, Esquire  
U.S. Attorney's Office  
Suite 311  
235 North Washington Avenue  
Scranton, PA 18503

/s/ Patrick A. Casey  
Patrick A. Casey